

**United States Bankruptcy Court  
Eastern District of Michigan**

In re **Pauline E. Cichon**

Debtor(s)

Case No. **13-42901-S**  
Chapter **13**

**ANSWER TO TRUSTEE'S MOTION TO DISMISS FOR  
FAILURE TO COMPLY WITH ACH AGREEMENT**

NOW COMES, Debtor, Pauline E. Cichon, by and through her attorneys, Babut Law Offices, PLLC with William C. Babut, J. Gregory Frye, and/or Nathaniel H. Herdt, and answers the Chapter 13 Trustee's Motion as follows:

1. That the Debtor, Pauline E. Cichon, admits the allegations set forth in paragraph number one.
2. That the Debtor, Pauline E. Cichon, admits the allegations set forth in paragraph number two, however further states that debtor has been ill with her cancer and is almost done with her treatments and should be able to get back to working full time.
3. That the Debtor, Pauline E. Cichon, lacks knowledge sufficient to form a belief as to the allegations set forth in paragraph number three.
4. That the Debtor, Pauline E. Cichon, admit to the allegations set forth in paragraph number four.

WHEREFORE, Debtor, Pauline E. Cichon by and through her counsels pray this Honorable Court deny the Chapter 13 Trustee their motion to dismiss, and allow the debtor to continue with their chapter 13 plan.

March 26, 2014

/s/ Nathaniel H. Herdt  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 26, 2014, a copy of **Answer to Trustee's Motion to Dismiss for Failure to Comply with ACH Agreement** was served electronically to the Chapter 13 Trustee and to the U.S. Trustee.

**-NONE-**

**/s/ Patricia E. Montgomery**

**Patricia E. Montgomery  
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